

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

STEFAN WOODSON,

Plaintiff,

v.

Case No. 3:13CV134 REP

CITY OF RICHMOND, VIRGINIA, *et al.*

Defendants.

**PLAINTIFF'S SECOND EXPERT DISCLOSURES**  
**PURSUANT TO FRCP 26(a)(2)**

Plaintiff Stefan Woodson, by counsel, hereby discloses the following experts in accordance with Rule 26(a)(2) of the Federal Rules of Civil Procedure and the agreement of the parties.

**I. RETAINED EXPERTS**

- 1. Applied Climatologists, Inc.  
Laurence Kalkstein, Ph.D  
896 Banyan Court  
Marco Island, FL 34145  
\$500 hourly rate**
- 2. David Sailor, Ph.D  
Department of Mechanical and Materials Engineering  
Portland State University  
P.O. Box 751  
Portland, OR 97207**

See Assessment Reports (November 19, 2013 report & September 5, 2014 report) by Laurence Kalkstein with Appendix A by David Sailor (Exhibit A), Laurence Kalkstein CV (Exhibit B), David Sailor CV (Exhibit C), Rate Summary and invoices for Kalkstein & Sailor (Exhibit D).

**3. Jeffrey Eiser  
Jail Operations and Corrections Expert  
12122 Huntergreen Drive  
Cincinnati, Ohio 45251**

See Correctional Standards report of Jeffrey Eiser (Exhibit E), Eiser's Cv and List of Testimonies (Exhibit F). Factual discovery is ongoing of the involved Deputies. Plaintiff reserves the right to supplement this disclosure, pertaining to new deputies, as discovery continues.

**Respectfully submitted,  
STEFAN WOODSON**

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 2nd day of September, 2014, I sent a copy of the foregoing electronically to:

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